

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Gary A. Falcone and	:	Case No. 19-70601-JAD
Tina L. Falcone,	:	
Debtors,	:	Chapter 7
	:	
Specialized Loan Services, LLC,	:	Related to Docs. 94 & 95
Movant	:	
v.	:	
	:	
Gary A. Falcone and	:	Document No.
Tina L. Falcone, Eric E.	:	
Bononi, Trustee,	:	
Respondents	:	

REPLY OF THE FALCONE RESPONDENTS

Now come Gary A. Falcone and Tina L. Falcone, by and through their attorneys, and not opposing the motion for relief from stay, respond as follows.

1. The Respondents do not oppose the motion for relief from the automatic stay, due to their inability to make the required Chapter 13 payments.

2. The Respondents do not agree, nor has there been any formal resolution, of the claims listed in paragraph 7 of the motion with respect to the amount of \$7,760.65 for "advances", and

\$3,480.28 for attorney fees/costs, as no proof has been proffered to support those amounts, nor are they contained in the amended proof of claim filed on behalf of the Movant.

Wherefore, the Respondents do not oppose the entry of an Order granting relief from stay, but otherwise oppose the amounts claimed due as specified above.

Respectfully submitted,

/s/Michael N. Vaporis
Michael N. Vaporis (46333)
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Attorneys for the Respondents
Gary A. Falcone and Tina L. Falcone

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was electronically served on the Chapter 13 Trustee, on July 30, 2021, and to the Movant's attorney, Keri P. Ebeck, Esq.

/s/ Michael N. Vaporis